

IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF
VIRGINIA
Arlington Division

XXXXXX by and through her Parents, :
JEFFREY AND SHARON SMITH, :
Plaintiffs, :
: Case No. 1:20-cv-00817
ARLINGTON COUNTY SCHOOL BOARD, :
Defendant. :
:

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

The Plaintiffs respectfully move for summary judgment in their favor on all claims in their Complaint, on the grounds that the Defendant has denied XXXXXX a Free and Appropriate Education, through substantive and procedural violations of the Individuals with Disabilities Education Act, and that the Hearing Officer's decision to the contrary, in the below state administrative Special Education Due Process Hearing, was in error. In further support of this Motion, Plaintiffs rely on the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment.

Dated: March 23, 2021

Respectfully submitted,

/s/

Grace E. Kim, Esquire,
VSB No. 87010
LAW OFFICE OF GRACE E. KIM, PC
11325 Random Hills Road, Suite 360-110
Fairfax, Virginia 22030
Phone: (703) 951-7320

Fax: (703) 225-3333
gekim@gekimlaw.com
Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March 2021, I will electronically file the foregoing with the Clerk of County using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John F. Cafferky
Attorney at Law
4020 University Drive, Suite 300
Fairfax, Virginia 22030
703-691-1235 (Office)

/s/ Grace E. Kim, Esquire
VSB No. 87010
Attorney for the Plaintiffs
LAW OFFICE OF GRACE E. KIM, PC
11325 Random Hills Road, Suite 360-110
Fairfax, Virginia 22030
Phone: (703) 951-7320
Fax: (703) 225-3333
gekim@gekimlaw.com